

February 18, 2022

VIA ECF

Honorable Allyne R. Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lavin v. Virgin Galactic Holdings, Inc., 1:21-cv-03070

Dear Judge Ross:

We write on behalf of both parties in the above-referenced matter to respectfully request that the Court modify the briefing schedule for Defendants' forthcoming motion to dismiss.

Pursuant to this Court's order of February 17, Defendants' moving papers are currently due on March 3, Plaintiffs' opposition is due on March 17, and Defendants' reply, if any, is due on March 24. Given the complexity of the issues presented in this case, the parties jointly request an extension of the current briefing schedule. With the proposed modification, Defendants' moving papers would be due on April 4, Plaintiffs' opposition would be due on May 19, and Defendants' reply, if any, would be due on June 30.

The briefing schedule for Defendants' motion to dismiss has not been previously extended or otherwise modified, and this request would not impact any other case deadlines.

We thank the Court for its consideration.

Respectfully Submitted,

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